

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	C.A. No. 16-122-LPS
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
GROUPON, INC.	)	
	)	
Defendant.	)	

**NOTICE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the following document was caused to be served on August 29, 2017, upon the following attorneys of record as indicated below:

IBM'S OBJECTIONS AND RESPONSES TO DEFENDANT'S  
SECOND NOTICE OF RULE 30(B)(6) DEPOSITION TO IBM

**VIA ELECTRONIC MAIL**

John G. Day  
Andrew C. Mayo  
Ashby-Geddes  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
[jday@ashby-geddes.com](mailto:jday@ashby-geddes.com)  
[amayo@ashby-geddes.com](mailto:amayo@ashby-geddes.com)

J. David Hadden  
Saina S. Shamilov  
Phillip J. Haack  
Adam M. Lewin  
Jessica Kaempf  
Fenwick & West LLP  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104  
[phaack@fenwick.com](mailto:phaack@fenwick.com)  
[jkaempf@fenwick.com](mailto:jkaempf@fenwick.com)  
[Groupon\\_IBM\\_Service@fenwick.com](mailto:Groupon_IBM_Service@fenwick.com)

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

John M. Desmarais  
Jon T. Hohenthanner  
Karim Oussayef  
Laurie N. Stempler  
Robert C. Harrits  
Brian D. Matty  
Michael Matulewicz-Crowley  
Brian D. Matty  
Kevin K. McNish  
DESMARAIS LLP  
230 Park Avenue  
New York, NY 10169  
Tel: (212) 351-3400

Dated: August 29, 2017  
5377060 / 43155

By: /s/ Bindu A. Palapura

David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Stephanie E. O'Byrne (#4446)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[sobyne@potteranderson.com](mailto:sobyne@potteranderson.com)

*Attorneys for Plaintiff International Business  
Machines Corporation*